

the Summons and Complaint on July 2, 2015. A copy of the Summons and Complaint was dispatched on July 2, 2015 by commercial courier to the business address of Defendant Mr. Ciurana.

DIVERSITY JURISDICTION UNDER 28 U.S.C. § 1332(a)

3. Pursuant to 28 U.S.C. § 1441(a), “any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

4. This Court has original jurisdiction over the Action pursuant to 28 U.S.C. § 1332(a), because there is complete diversity of citizenship between Plaintiffs and Defendants, and the amount in controversy in the Action exceeds \$75,000, exclusive of interest and costs.

5. Defendant Univision was and is a California corporation with a principal place of business in Florida. *See* Ex. A, Compl., ¶ 7. Defendant Mr. Ciurana was and is a citizen of Mexico who is lawfully admitted for permanent residence in the United States and domiciled in Florida. *See* Ex. A, Compl., ¶ 8.

6. Plaintiff Mr. Trump was and is a citizen of the State of New York. *See* Ex. A., Compl., ¶ 5.

7. According to the Complaint, Plaintiff MUO was and is a Delaware limited liability limited partnership with a principal place of business in New York. Ex. A., Compl., ¶ 4. Plaintiff MUO is not a citizen of either California or Florida because it is a limited liability partnership without any partner that is a citizen of California or Florida. According to the Complaint, MUO’s sole partners are: (1) Plaintiff Mr. Trump, a citizen of New York, *see* Ex. A, Compl., ¶ 5; and (2) NBC Pageants, a citizen of New York and Delaware, *see* Ex. A, Compl., ¶ 6.

8. Plaintiffs allege an amount in controversy “in excess of” \$500,000,000. *See* Ex. A, Compl., ¶¶ 45, 50, 55, 61; 28 U.S.C. § 1446(c)(2).

9. Venue is proper pursuant to 28 U.S.C. §§ 1441(a) and 1446(a) because this Court is the district court of the United States for the district and division embracing the Supreme Court for the State of New York, County of New York, where the Action is pending.

COMPLIANCE WITH REMOVAL PROCEDURES

10. Pursuant to 28 U.S.C. § 1446(a), true and correct copies of all process, pleadings, and orders filed in this Action are attached to this Notice of Removal as Exhibit A.

11. This Notice of Removal has been filed within 30 days of June 30, 2015, the date this Action was filed in New York State Court. Removal is therefore timely in accordance with 28 U.S.C. § 1446(b).

12. Defendants will promptly serve on counsel for Plaintiffs a Notice of Filing of Notice of Removal and file such Notice with the Clerk of the Supreme Court of the State of New York, County of New York, pursuant to 28 U.S.C. § 1446(d). The Notice of Filing of Notice of Removal will include a copy of this Notice of Removal.

13. By filing this Notice of Removal, Defendants do not waive any claim, argument, or defense that may be available to them, including, without limitation, the defenses of lack of personal jurisdiction, insufficient service of process, and improper joinder. Defendants do not concede that Plaintiffs have pleaded any claim upon which relief may be granted.

14. Defendants reserve the right to amend or supplement this Notice as may be appropriate.

CONCLUSION

15. For the foregoing reasons, Defendants hereby remove this Action from the Supreme Court of the State of New York, County of New York, to the United States District

Court for the Southern District of New York. Defendants respectfully request that the Court enter such orders and grant such other and further relief as may be necessary to effectuate the removal.

Dated: New York, New York
July 10, 2015

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